

1 Randall J. Roske, Esquire
2 2055 West Charleston Boulevard, Suite C
3 Las Vegas, Nevada 89106-4026
(702) 386-0313
3 Attorney for Defendant
VLADIMIR BUDESTEAN
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5 UNITED STATES DISTRICT COURT
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7 DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 VLADIMIR BUDESTEAN
14 VALES;s et al.,
Defendants
15

CASE NO. 2:11-CR-00434-LDG-PAL

16 JOINDER TO DEFENDANT VLADIMIR BUDESTEAN
17 MOTION TO CONTINUE TRIAL

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19 Defendant VLADIMIR BUDESTEAN, by and through his attorney, Randall J. Roske,
20 hereby joints in Co-Defendant Michael Vale's MOTION TO CONTINUE TRIAL in the above-
21 styled matter.

22 DATED this 11th day of December, 2012.

23
24 /s/
RANDALL J. ROSKE, ESQ
Nevada Bar Number 00456
25 2055 West Charleston Boulevard, Suite C
26 Las Vegas, NV 89102
(702) 386-0313
27 Attorney for VLADIMIR BUDESTEAN
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SUPPLEMENTAL POINTS AND AUTHORITIES

2 Defendant VLADIMIR BUDESTEAN hereby adopts the points and authorities submitted
3 defendant Michael Vales, and submits the following to supplement that argument.

4 1. Discovery in this case consists of at least 8 CD's. According to Bates Stamps there
5 are over 20,000 pages of discovery. Based on CA guidelines, if 1 minute per page for discovery
6 review, the amount of discovery in this case would amount to over 330 hours, which translates
7 into over two months of 40 hour weeks.

8 2. Due to the undersigned case load in family court and justice court, along with several
9 other U.S. government cases (4), counsel is not yet prepared to go forward with trial in this case.
10 Counsel has not completed discovery review.

11 3. Vladimir Boudestean is detained. He does not object to the continuance.

12 DATED this 11th day of December, 2012.

ORDER

21 || IT IS SO ORDERED.

22 DATED this 26 day of December, 2012.

Lloyd D. George
Sr. U.S. District Judge